

Central Valley Regional Water Quality Control Board

9 June 2016

Mr. Joseph C. McGahan
Drainage Coordinator
Grassland Bypass Project
Post Office Box 2157
Los Banos, CA 93635

PESTICIDE MONITORING PLAN SUBMITTAL FOR GRASSLAND BYPASS PROJECT ORDER R5-2015-0094

Thank you for your letter dated 15 April 2016 addressing the Pesticide Monitoring Plan submittal requirement of Order R5-2015-0094, San Luis & Delta-Mendota Water Authority and United States Bureau of Reclamation Surface Water Discharges from the Grassland Bypass Project (Order). The deadline for the Pesticide Monitoring Plan required by the Order was 30 April 2016. Attachment B, Section II.C of the Order states that the Executive Officer will provide the San Luis & Delta-Mendota Water Authority and United States Bureau of Reclamation (Dischargers) with a list of pesticides that must be evaluated for inclusion in the pesticide monitoring program. The list of pesticides and evaluation protocol is still being developed.

In your letter, you noted that other Irrigated Lands Regulatory Program Waste Discharge Requirements (WDRs) have the same requirement for pesticide monitoring. However, language is included in those WDRs directing the associated third-parties to continue monitoring as described in their Monitoring and Reporting Program Plans, previously approved by the Executive Officer, until the pesticide list and evaluation protocol is issued. No similar language is provided in the Order to direct the Dischargers.

Based on this information, and with the knowledge that monitoring for pesticides was not required under the previous Monitoring and Reporting Program Order 5-01-234 for the Grassland Bypass Project, I approve your request to continue monitoring per the listed constituents identified in Table 2 of Attachment B to the Order, which lists pesticides as to be determined. Once the pesticide list and evaluation protocol is issued, the Pesticide Monitoring Plan must be prepared and submitted as described in Attachment B, Section III.F, to the Order, **within 60 days**. Monitoring of all other constituents in Table 2, including toxicity testing, shall continue in the interim according to the Order's requirements.

If you have any questions regarding this letter, please contact Ashley Peters at (916) 464-4857 or by email at Ashley.Peters@waterboards.ca.gov.

Sincerely,

Original signed by Adam Laputz for

Pamela C. Creedon
Executive Officer